

Comment Number	Page Number	Section, Figure, or Table No.	Commentor	Comment	
	G-4	Definitions Table	JS	<p>Added Definition: Should the State Code Section be cited for "endangered"?</p> <p>A definition should be added for "Estuarine fish". [It is unclear to me in the writings of the document as to what a Estuarine fish is, so a definition is difficult to formulate.</p> <p>However, my definition of an Estuarine fish is: 'a fish that in habitats the brackish waters of the Suisun Marsh, Grizzly and Suisun bays, and southern-western Delta.'</p>	ok w/ changes
	G-5	Definitions Table; incidental take	JS	<p>The definitions should be modified to drop the word "wildlife" since the section 9(a)(2) discusses plants.</p> <p>This sections should also reference California's 2081 Memorandum of Understanding or permit process that allows for the take (intentional or incidental) of endangered, threatened, or candidate species as a result of lawful activities.</p>	ok
	G-5	Definitions Table; listed species	JS	<p>This definition should be modified to include a reference to federally listed species and read as follows:</p> <p>"...endangered by the California Department Fish and Game Commission and the federal fish and wildlife agencies.</p>	ok
	G-6	Definitions Table; raptor	JS	<p>[This definition as written would includes birds such as Puffins and Least willows flycatchers.] This definition should be rewritten as follows:</p> <p>"bird species in the order Falconiformes such as hawks, eagles, kites, and falcons."</p>	ok w/ change

	G-7	Definitions Table; take	JS	This definition should be expanded to also include a reference to plant species. This can be easily done by adding the word "plant" to locations where wildlife is listed. Is there any need to reference CESA with regards to take?	ok
	ES-1	Third Paragraph	FW	The purpose described is not consistent with the purpose described on page 1-2.	
	ES-2	Third Paragraph	MB	"Covered species are evaluated species which will be adequately conserved by implementation of the MSCS and ERP." This should/will be revised in accordance with the Staff Team meeting discussion of 4/20/99.	
	ES-3	Second Paragraph	FW	In second line "Ecological" should be changed to "Ecosystem".	
	ES-4	Third Paragraph	FW	On the fourth and fifth lines it describes the "Through-Delta Conveyance" as one of the eight elements. In the context of this programmatic MSCS and the manner in which an isolated facility is discussed in later sections it seems inconsistent to describe this element in this manner. Table 5-1 on page 5-9, for instance describes an isolated facility. This same comment applies to page 4-1.	
	ES-4	Third Paragraph	FW	On the last four lines it describes, in detail the components of this element. Since some of these have not been decided on it may need to be modified to reflect the outcome of the SDI process. This same comment applies to pages 4-1 and 4-3.	
	ES-5	Second Paragraph	FW	This paragraph should make it clear that two of the "natural communities" are ecologically based fish groups that are analyzed as species and not just their habitats.	
	1-2	last paragraph	MB	"ERP...will emphasize the use of natural processes to reestablish a sustainable environment for plants, fish and wildlife." How does this approach assure that adequate mitigation/conservation will be provided?	
	1-3	Second Paragraph	FW	"Environmental ratcheting" should be defined or a different description used.	

	1-4	1.4.2	LB	<p>This section on <i>Evaluated Species, Covered Species, and Their Habitats</i> is not clear. Sentence 1 discusses a list of species that use the focus area. Sentence 2 discusses a shortened list of species that could be affected by CALFED programs or are listed. Sentence 3 discusses a further shortening of this list to those species that are adequately covered under the CALFED program. Sentence 4 states this category contains species for which take authorization could be issued.</p> <p>What does the list of species indicate? Is there a list of species that are not adequately covered under the CALFED program? Are there species for which take authorization will not be issued?</p>	
	2-6	Table 2-1	HR	<p>Another group of species that includes "freshwater resident fish species" needs to be referenced here to cover the species listed latter in the document under "contribute to the recovery". For example, Sacramento Perch could be included in the group identified as "freshwater resident fish species"</p>	
	2-11	Giant Garter Snake	LB	<p>This species is listed as "not likely to be affected" because "species occurs in areas that would not be affected by the CALFED actions". This is incorrect as the range of the giant garter snake falls entirely within the focus area of the ERPP. Additionally, this contradicts Volume I of the ERPP page 36 where it is stated that the vision of the giant garter snake is to assist in the recovery.</p>	
	2-14	Riparian Brush Rabbit	FW	<p>The species goal should be a big "R".</p>	
	2-14	Spring-run Salmon	FW	<p>Spring-run should be added to this table.</p>	
	2-15	Fall-run Salmon	FW	<p>Under Central Valley Fall-run consider adding reference to Sacramento and San Joaquin fall-run and late fall-run.</p>	

	3-1	Species and Habitat Goals; 1st paragraph.	JS	<p>The following sentence needs to be either deleted or moved to later in the paragraph and a sentence added that associates this statement with "little r" species:</p> <p style="padding-left: 40px;">"For CALFED, this goal may not be feasible for some species, mainly fish, threats to which extend beyond the scope of the CALFED Program."</p> <p>As currently written, individuals may view this statement as giving CALFED an out to achieving its desired results, species recovery.</p>	
	Page 3-1	Paragraph 1	HR	The number of fish species in the recovery category stated here is less than those listed in that same category on the tables in this chapter.	
	3-2	15	RB	recovery=delisting at a minimum, but recovery criteria (incomplete list in table3-1) taken from the recovery plan, not from the list of threats to the species in Fed. Register. W/o removing the threat, species may increase in abundance during good conditions, but will still be "threatened"	
	3-4	Table 3-1; Prescriptions for Species with "R" and "r" Goals	RB	some longfin distribution criteria out of human control and only slightly affected by abundance; also, outflow abundance relationship referred to in #4 is incorrect in the Native Species Recovery Plan; this equation should be formally recalculated and published. Aside: outflow abundance relationship has changed since Potamcorbula (the line is parallel by lower: recovery criteria will not be met!).	
	3-5	Table 3-1; Prescriptions for Species with "R" and "r" Goals	RB	Sacramento splittail criteria is ambiguous -- try and figure out what they mean.	

	3-4	Table 3-1; Prescriptions for Species with "R" and "r" Goals	HR	<p>We recommend using a consistent methodology prescribing recovery goals for anadromous salmonids that are in the same species assemblage with similar life history strategies and requirements. Specifically, we recommend that the recovery goals developed for spring-run chinook be consistent with the methodology developed in the winter run recovery plan.</p> <p>In the Spring-run Chinook Category in this table include Battle Creek as one of the habitats critical for recovery of the species.</p>	
	3-6	Table 3-1; Prescriptions for Species with "R" and "r" Goals	SC	The salt marsh harvest mouse is missing in this table.	
	3-8	Section 3.3	HR	Relationship with Recovery Plans- This section needs to mention CESA. It only mentions recovery plans pursuant to federal ESA. This document states that one of the purposes of the proposed Conservation Strategy is to ensure compliance with the endangered species laws, not be a segregate for those regulations.	
	3-9 and 10	3.4 and 3.7	FW	Reference to the "Strategic Plan" prepared by the Core Team should be deleted and replaced with the strategic plan prepared by CALFED as part of the ERPP.	

	4-1	CALFED Program Actions	HR	<p>Perhaps the most significant environmental effect of implementing CALFED Program Actions upon the upper Sacramento River are related to reoperation of the existing reservoirs and diversions to service the off-stream storage facilities. The potential range of reoperation needs to be thoroughly disclosed and analyzed and should include but not be limited to:</p> <ul style="list-style-type: none"> a. temperature control capability in the upper Sacramento River designated salmon spawning areas. b. season that may affect the ability of the river to assimilate wastes (i.e. Iron Mountain Mine) and provide stable flows during the egg incubation period for salmon and steelhead. c. releases during the flood control season that can affect critical ecosystem functions in the spawning riffles and riparian forest along the meander belt of the river. d. Diversion Dam with gates up September to May. 	
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	4-3		HR	<p>What does redirected impacts bullet mean where it mentions "when viewed in their entirety"? Any reduction in the water projects operations ability to attain the existing baseline in the upper Sacramento River should be considered a redirected impact, including but not limited to the following legally established baseline conditions:</p> <p>a. beneficial uses of salmon spawning in the uppermost 100 river miles of the upper Sacramento river (Keswick to Hamilton City coupled with the protections established for all the state land in the river bottom of this reach designated by the legislature in Section 1505 of the Fish and Game Code.</p> <p>b. Water Rights Order 90-5 and the water rights agreement for Shasta Dam that stipulates a need to attain stable flows in the Sacramento river during the period salmon eggs are incubating in the river. In addition, the water rights agreement for Shasta Dam stipulates that any diversions near Red Bluff need to avoid any harmful affects on the salmon fishery support designated beneficial use. In other words by keeping the water in the river reach designated for the beneficial use of spawning then diverting from the river at a reach that does not have that designation the use of the water is maximized.</p>	
	4-4	5th bullet	RB	230 miles of Suisun marsh levees rehabilitated???? What a bone to throw to the duck clubs! Does this mean more Suisun M habitat elsewhere will go back to tidal action w/o argument?	
	4-5	sec 4.1.3	RB	improved outflow in spring while decreasing it in the winter will adversely effect longfin.	
	4-5	4.1.3	FW	Restoring Delta channel hydrodynamics should also be listed.	
	4-8	4.1.8	FW	The outcome of the SDI effort should be substituted for this description.	
	Chapter 5		HR	Conservation measures for biological communities must include all the preexisting conservation measures described above.	

	5-3	Table 5-1	JS	Columns under "Applicable CALFED Regions" the column after "SR" should be listed as "SJR".	
	5-3	Table 5-1; first row	JS	The row that talks about "Provide for more natural river flows and Bay-Delta freshwater inflow peaks in fall. Winter, and spring of all but critical years (E1)" should be modified to read as follows: "...and spring of all but critical water years, flow supplementation (magnitude and duration) would depend on the type of water year.	
	5-3 to 5-9	Table 5-1	LB	Identify the meaning of the letters and numbers used in the Summary Programmatic Action Outcomes; examples of these codes are E1, E2...O1, O2.	
	5-3	Table 5-1	FW	Other mechanisms for restoring Delta channel hydrodynamics should also be listed such as operational changes and use of an Environmental Water Account.	
	5-4	Table 5-1	JS	Restoration and maintenance of riverine aquatic habitats (E6) continued: Markers should be added to the columns for the Delta and Bay regions denoting the potential for these activities occurring in those regions.	
	5-7	Table 5-1	JS	Levee System Integrity Program; last row this section. This item does not apply to the Levee System Integrity Program Move this Action to the Water Quality Program.	

	5-5	Table 5-1	LB	It is not clear what is meant by checking only the Delta and Bay regions as the applicable CALFED regions in regards to vernal pools. If Action Outcomes are only going to be considered in these two areas, the scope is too narrow. The ERPP, volume I, pages 279-282, states a vision of protecting and enhancing existing populations, two of which are in Merced and Lake Counties. Additionally the ERPP links the vernal pool guild of plant species with the restoration of vernal pool habitat (ERPP, volume I, page 281. The vernal pool guild of plants includes, but is not limited to, species from the following counties: Stanislaus, Solano, Colusa, Fresno, Mendocino, Placer, Santa Barbara, and San Joaquin.	
	5-8	last rows on page	RB	south delta conveyance feature modifications will affect the Bay to the degree they limit outflow and remove biota (not presently indicated) This is true for several other conveyance alternatives (c2 and c3, s1)	
	5-6	Table 5-1	FW	Add an X in the Delta column for riparian brush rabbit.	
	Page 5-8	Table 5-1: Water Transfer Program	SC	Impact mechanisms and potential adverse effects of water transfers, particularly on anadromous fish species, needs to be elaborated.	
	Page 5-8	Table 5-1: Watershed Management Program	SC	The second item should be deleted because it is not a watershed program action but rather a feature of conveyance facilities.	
	5-9		HR	Under construct and operate enlarged or new storage facilities item 3 should be : "Reoperation of existing or enlarged storage facilities and reoperation of existing or enlarged diversion facilities resulting in an alteration of riverflow downstream of those facilities.	

	5-9	bottom of page	HR	Under conveyance and storage operations include: reoperation of the SWP and CVP to support post project water management goals and objectives resulting in an alteration of preproject river flows in the rivers upstream of the delta.	
	5-9	Table 5-1: Summary Outcomes; Conveyance Facilities	SC	The description of impact mechanisms associated with operational tidal barriers is incomplete and oversimplified and should be elaborated.	
	5-10	second paragraph	SC	The first criterion listed under the description of species not likely to be affected by CALFED Program actions (species are highly mobile and for which habitat is not limiting) does not consider the sensitivity of a species to disturbance factors. Just being highly mobile doesn't mean there are no adverse effects resulting from program actions.	
	5-10	section 5.1.3	SC	<p>"....habitats that may be used by a species only under limited or special circumstances...were not considered to be a habitat type with which the species is associated."</p> <p>This statement seems to present a very conservative view on habitat utilization.</p>	
	5-10 to 5-11	Section 5.1.4	SC	How DFG make a determination of adequate conservation without assurances that program actions and conservation measures will be implemented?	

	5-11		HR	How impacts occur – the analysis is not available and several key impacts were not evaluated based upon Table 5-1 comments above. Key effects of CALFED Actions for upper Sacramento River are riverflow operation and alternative increases in the diversion rate at Red Bluff Diversion Dam by several fold (see Status Report- North of the Delta Off stream Storage Investigation dated October 19, 1998 received by DFG Region 1 April 21, 1999). Enlarging the canal and greatly increasing the diversion rate will make it unlikely that pumping alternative can be used as it is in the existing baseline condition; thereby reducing the practicality of the gate removal operation at the dam and reducing flows in the meander belt below the dam. Red Bluff Diversion Dam is important because of the 30 year documented history of harmful effects on anadromous fish and the major role its historical operation played in jeopardizing the future existence of a number of species chosen for recovery in this CALFED document. In addition, the investment of public funds in the meander belt cannot be protected if the ecological processes that support its function are interfered with by the removal of water.	
	5-11	NCCP Habitats and Associated Species	FW	This paragraph should make it clear that two of the “natural communities” are ecologically based fish groups that are analyzed as species and not just their habitats.	

	5-11	NCCP Habitats and Associated Species	MB	<p>"The analysis assumes that summary outcomes on NCCP habitats represents the range of effects, both beneficial and adverse, on habitat quality and habitat quantity on the species associated with each NCCP habitat."</p> <p>A habitat based plan does not necessarily provide adequate protection for plants. What assurances will be provided that sensitive plant populations will be adequately conserved by this plan rather than substantially impacted by CALFED actions? General information should be provided regarding requirements for site specific surveys as well as those measures (general) or processes that will be implemented assure adequate conservation of covered plant species.</p>	
	5-12	3rd paragraph, last sentence	JS	<p>The last sentence should be reworded to read as follows:</p> <p>Quality of the data was assessed by a review of draft maps by knowledgeable persons individuals familiar with the habitat types.</p>	
	5-13	Prescriptions for Reaching Species Goals	SC	<p>The text states "The prescription for each species provides habitat or population targets that, if met, would achieve the goal for the species." Consider changing text to read "...habitat or population targets that, if met, would presumably achieve the goal for the species." We need to clearly convey the notion that species prescriptions, as well as targets, are subject to change through the adaptive management process and what we learn through monitoring and research.</p>	
	5-13	Prescriptions for Reaching Species Goals	RB	<p>refer to comments 2 and 3; species goals listed are erroneous and inadequate; and incomplete relative to even Nat. Spec. Recovery Plan. NSRP does not tie removal of threat to recovery.</p>	

	5-14	Last paragraph	MB	Some CALFED actions will result in the conversion of existing natural (non-agricultural) habitat types to other natural habitat types. What assurances are there that covered plant populations will be adequately conserved/mitigated?	
	5-15	Table 5-3	MB	While it is understandable that the MSCS should not unduly duplicate other CALFED documents, the number of acres lost in each habitat category resulting from CALFED actions should be provided.	
	5-24	Table 5-5	MB	Will site specific species surveys be conducted as part of implementation of CALFED actions and the MSCS? If they will be, then the MSCS should include that as one of the implementation strategies.	
	5-26	Table 5-5	SC	Anadromous fish species and Estuarine fish species: "The proposed actions...would lead to substantial improvement in ...populations and habitat." This is an equivocol statement. The summary effects in this table are untested hypotheses. Consider changing text to read "...may potentially lead to significant improvement...".	
	5-28	Table 5-6	JS	The riparian brush rabbit should be added to this table as an "R" species.	
	5-28	Table 5-6	FW	The San Pablo California vole should be listed as an "r" species on the next page.	
	5-29	Table 5-6	FW	Several species are missing from this table: salt marsh harvest mouse and San Joaquin Valley wood rat.	
	5-29	Table 5-6	FW	The summary of effect for Swainson's hawk reads like one crafted for an "R" species. Some editing may be in order.	

	5-30	Section 5.4; second paragraph	SC	The text states that not all conservation measures to avoid, minimize, or compensate for CALFED Program impacts will be applicable to specific CALFED actions. What criteria would be used to select measures from a menu of conservation measures? What assurances can be offered to ensure that a species will be adequately conserved?	
	5-31	5.4.1	FW	<i>Eliminate "primarily" in seventh line.</i>	
	5-32	Table 5-7	MB	The title should be reworded to make it clear that this does not include species such as those that are fully protected by the state. It should be as definitive as the explanations provided in Section 7.3-2, pg. 7-7.	
	5-36	item #9	MB	The proposal to relocate captured individuals is controversial as many biologists believe that this generally is not successful and therefore, is not a valid mitigation/conservation measure.	
	6-1	first paragraph	SC	The text states that the CALFED Program will be consistent and synergistic with existing wildlife protection and recovery plans and then lists some of these plans. There is no explanation of <u>how</u> the MSCS will achieve consistency and synergism with these other programs. This information is necessary to determine whether covered species will be adequately conserved by the combined efforts of CALFED and other non-CALFED programs.	
	6-1	6.1.1	FW	The text ends without completing the section. Page 6-2 starts out of context.	
	6-1	6.1.1, second paragraph	SC	The text alludes to information and conservation measures in USFWS and NMFS recovery plans with listing any specific plans. Consider mentioning the Recovery Plan for the Sacramento/San Joaquin Delta Native Fishes and the Recovery Plan for Upland Species of the San Joaquin Valley, California.	
	6-2	6.1.3	FW	Relevant CESA 2081 agreements should be listed.	

	6-3	Section 6.1.5; CVPIA	SC	Briefly describe the AFRP and goal of doubling natural production of anadromous fish.	
	7-1	7.1	FW	This sections states DFG will receive the MSCS for approval as a NCCP. Elsewhere in this document it states that DFG will use the MSCS to prepare a NCCP. This should be clarified.	
	7-4	Section 7.2.3	SC	<p>“Further, to qualify for the streamlined compliance process, a CALFED Program action must be proposed as it is described and analyzed in the PEIR/EIS and as it is described in the MSCS.”</p> <p>Is this sentence saying that in order to qualify for a streamlined process, the effects of a proposed action must be described, at least at a programmatic level in the PEIR/EIS? Since this section of the document is dealing with action-specific implementation plans, proposed program actions will necessarily be more detailed than what is presented in the PEIR/EIS.</p>	
	7-3	paragraph 2	MB	In order to be consistent with Section 2081(b) of the Fish and Game Code, should the requirements contained within that section be included? Specifically, the requirements to fully mitigate, rough proportionality, be capable of successful implementation, assurance of adequate funding to implement the mitigation, monitor compliance, and monitor the effectiveness of the mitigation.	
	7-5	Type 1 actions; paragraph 2	MB	Same comment as for page 5-3, above, regarding section 2081(b). Should F&G Code section 2080.1 consistency determinations be included as another possible method of receiving take authorization from the state for dually listed species?	

	7-8	Section 7.4.1	MB	<p>“...it is not possible to precisely identify what agency or other entity will implement each of the Program actions and the measures in the MSCS and ASIPs.”</p> <p>Why not delineate the process or strategy for identifying the appropriate agencies and/or entities? Who will bear ultimate responsibility? Users or resource agencies?</p> <p>In addition, this constitutes an undefined impact on DFG, particularly with respect to DFG’s role in implementation of mitigation/conservation measures as well as monitoring those measures. The process for who does what and the funding source should be delineated. It should be clear that DFG will not be the “fall back” position.</p>	
	7-11	Section 7.4.5	MB	<p>The funding discussion is not provided. This is a critical element with potential to adversely impact CDFG. DFG should not imply approval of this draft until this information is provided. DFG is defined as a CALFED agency. Responsibility for funding and implementing mitigation for CALFED actions should not fall on DFG. “Users pay” concept should be implemented. In addition, increased water for fish and wildlife required as part of CALFED implementation should not render DFG a “user”.</p> <p>This document does not provide adequate information regarding the timing of mitigation as it relates to CALFED actions. How is funding for mitigation assured and what is the timing? What if adaptive management for early bundles shows that mitigation was not enough or too much - what is the process for handling subsequent bundles?</p>	

	7-11	Draft Section 7.4.6; paragraph 2	MB	<p>The text states “Because the MSCS is a comprehensive conservation plan, the entities undertaking Program Actions will receive assurances that the Wildlife Agencies will not require additional commitments of land, money or water, and will not impose further restrictions on the use of land or water, to conserve Covered Species than are provided for in the MSCS...”</p> <p>Compare language in Chapter 8, Compliance Monitoring, Section 8.2: “...Documentation of compliance with ESA/CESA/NCCPA requirements will become part of the CALFED permitting process as developed by the Wildlife Agencies. The information derived from monitoring the success or failure of these actions may be used in determining the actions to be implemented in the next stage of the CALFED Program.”</p> <p>What happens if this requires a further commitment of land, water, money, etc.? If that kind of assurance is to be provided at this time, then the data on which the MSCS is based should be a lot better and more precise conservation strategies should be identified as part of this document, particularly with respect to what happens if it is not working?</p>	
	8-2	Section 8.2	MB	<p>“The information derived from monitoring success and failure of these actions...”</p> <p>Change “may” to “shall”, otherwise this document does not provide any assurance that covered species will be adequately conserved.</p>	

	8-3	Paragraph one	MB	<p>"The primary means by which progress towards goals for MSCS species will be measured is expected to be through monitoring the distribution and abundance of habitat types over time."</p> <p>This does not adequately address conservation of plant species. Suggest that methodology or a process to monitor the success of the program with respect to covered plant species be included.</p>	
	9-1		MB	<p>The concept of adaptive management appears to contradict the concept of "assurances" for "users". In order for all participants to feel comfortable regarding balancing the commitment to not require more of "users" with respect to mitigation requirements, yet ensuring that covered species will not be adversely affected as a result of inadequate conservation, the process that will be utilized to balance these conflicting "needs" should be identified in the MSCS. What will have priority? The economics of the "users" or conservation of the covered species?</p>	
	Appendix 1	NCCP Habitats	LB	<p>The following changes need to be made:</p> <p>Garzas - add checks to the upland scrub and valley/foothill woodland and forest boxes.</p> <p>Ingram - add a check to the natural seasonal wetland box.</p> <p>Orestimba - add checks to upland scrub (records show 10% of the site is chaparral and valley valley/foothill woodland and forest boxes.</p>	
	Appendix 1	Summary of Species Potentially Occurring but not on the List	LB	<p>If the California wolverine is to be added as a species that could potentially occur near proposed CALFED reservoir sites, then the Pacific fisher should not be removed.</p>	

	Appendix 1	Garzas: Potential Species Occurrence	LB	Add the following species: California tiger salamander, western spadefoot toad, red-legged frog, foothill yellow-legged frog, California horned lizard, silvery legless lizard, San Joaquin whipsnake, and tricolored blackbird.	
	Appendix 1	Ingram: Potential Species Occurrence	LB	Add the following species: California tiger salamander, western spadefoot toad, red-legged frog, foothill yellow-legged frog, California horned lizard, silvery legless lizard, and San Joaquin whipsnake.	
	Appendix 1	Orestimba: Potential Species Occurrence	LB	Add the following species: California tiger salamander, western spadefoot toad, red-legged frog, foothill yellow-legged frog, silvery legless lizard, San Joaquin whipsnake, and golden eagle.	
	Appendix 1	Panoche: Potential Species Occurrence	LB	Add the following species: Molestan blister beetle, California tiger salamander, western spadefoot toad, red-legged frog, foothill yellow-legged frog, California horned lizard, silvery legless lizard, San Joaquin whipsnake, Alameda whipsnake, and golden eagle.	
	Appendix 1	Quinto: Potential Species Occurrence	LB	Add the following species: California tiger salamander, western spadefoot toad, red-legged frog, foothill yellow-legged frog, California horned lizard, silvery legless lizard, San Joaquin whipsnake, and golden eagle.	
	Attach 4	Table A	RB	The relationship between splittail and riparian forest (VFR) and flooded ag land in bypasses (SFA) is missing.	
	Attach 4	Table A	FW	Add an X for the salt marsh harvest mouse in managed seasonal wetland.	
	Attach 5	all tables	SC	Format issue. It would greatly improve the tables if, reading across a row, the potential beneficial effects were tied to potential adverse effects and conservation measures to offset adverse effects.	
	Attach 5	Table B	LB	Add the following species to those potentially affected by the Program: red-legged frog	

	Attach 5	Table B, Valley Riverine Aquatic, Row 3	LB	<p>It is not clear how disturbing existing shaded riverine aquatic overhead cover (Conservation Measure) could result from a reduction in contaminant loading (Beneficial Effects).</p> <p>It clear why there would be construction activities (Adverse Effects) to reduce contaminant loading (Beneficial Effects).</p>	
	Attach 5	Table E	MB	<p>This table addresses potential beneficial and adverse effects on species inhabiting saline emergent communities. One such species is the salt marsh harvest mouse, a fully protected species. One identified adverse affect is mortality. How will this be balanced against the status of the species, since the fully protected statutes prohibits take? This is true of all fully protected species addressed by this document.</p> <p><u>General</u></p> <p>The MSCS does not impart an assurance that covered species will be adequately conserved. It may be a result of the fact that every chapter has a different author and that plants appear to be neglected since the emphasis is on habitat. The following is a major inconsistency.</p>	
	Attach 5	Table L, Grassland	LB	<p>Why is the California condor listed as an <i>Associated Evaluated Species Potentially Affected by the Program</i> yet it was listed as <i>Not Likely to be Affected</i> in Table 2-2, Species Evaluated in the MSCS.</p>	
	Attach 5	Table S	FW	<p>Starting with this section and extending through the remainder of the document the word "extent" has been accidentally omitted before the word "consistent" in the first line of the right hand column.</p>	

	Attach 5	Table T S+T	FW	The conservation measure listed for the second and third rows should deleted and new measures prepared. The ones listed are inconsistent with the ERPP and in direct conflict with measures listed for other species groups.	
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Comments by:

MB= Marina Brand; FW= Frank Wernette; JS= Jim Starr; LB= Laurie Briden; SC= Scott Cantrell; HR= Harry Rectenwald

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